



GCW – Group of Companies Whistleblower Policy

Whistleblower Policy

Purpose

This Policy has been developed for use by GCW Holdings Pty Ltd entire group of companies and is used to support whistleblowers, who in good faith and without malice, disclose information or raise concerns about alleged improper or illegal activity.

The GCW Group of companies (GCW) are committed to providing services in a safe and honest way. We expect everyone to comply with all legal requirements. We will support and respect anyone who acts as a whistleblower to draw attention to suspected inappropriate, corrupt or illegal conduct or behaviour.

Scope

All Officers, Directors, Employees, Contractors, Consultants and Agency staff are bound by this policy, irrespective of their status, position or location and must be adhered to, in conjunction with all company Policies and Procedures.

Definitions

Whistleblower

A person who raises concern regarding illegal and/or improper conduct that affects others. The person is not usually involved in the issue but is wanting to alert others to suspected misconduct.

Principles

GCW encourages people to speak up, to make complaints and raise concerns about service integrity, safety and quality.

GCW has good governance and responds appropriately to concerns about illegal or inappropriate conduct, whether that is provided as feedback, a complaint or a person acts as a whistleblower.

People who 'blow the whistle' are not victimised and will always be treated fairly and with respect.

GCW group of companies will not retaliate against whistleblower including employees, for raising an alert about suspected misconduct.

These standards of behaviour are intended to operate in addition to, and in conjunction with, the GCW - Code of Conduct policy.

What is Reportable Conduct?

You may make a report under this policy if you have reasonable grounds to suspect that a Director, Officer, Employee, Contractor, Supplier, Tenderer or other person who has business dealings with any of the GCW group of companies has engaged in conduct (Reportable Conduct) which:

- is dishonest, fraudulent or corrupt, including bribery or other activity in breach of the GCW - Anti- Bribery Policy.
- amounts to an abuse of authority or a conflict of interest.

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- is illegal activity – such as theft, violence, harassment or intimidation, criminal damage to property, breach of competition and consumer law, breach of privacy law or other breaches of state or federal law.
- is unethical or in breach of any GCW group of company's policies – such as dishonestly altering company records or data, adopting questionable accounting practices or wilfully breaching GCW – Code of Conduct or other policies or procedures.
- is potentially damaging to any of the GCW group of companies or their employees or a third party, such as unsafe work practices, environmental damage, health risks or abuse of any property or resources.
- may cause financial loss to any GCW group of company or damage its reputation or be otherwise detrimental to their interests.
- involves harassment, discrimination, victimisation or bullying, other than personal work-related grievances as defined in the Corporations Act; or
- involves any other kind of misconduct or an improper situation or circumstances.

Reportable Conduct generally does not include personal work-related grievances. These are grievances which relate to a current or former employee's employment or engagement that have implications for only that person and do not have broader implications for the GCW Group.

Examples include:

- a conflict between you and another employee.
- a decision relating to your promotion or transfer.
- a decision relating to the termination of your employment.

Such matters should be raised directly with your manager or through GCW – Human Resource Grievance process. In limited circumstances, a personal work-related grievance may amount to Reportable Conduct under this policy, such as where the grievance relates to conduct that has been taken against a person because they made a report under this policy. GCW expects that reports made under this policy are made honestly, ethically and on reasonable grounds.

Who can I make a report to?

Please follow the below steps to make a report if you become aware of any issue or behaviour which you consider to be Reportable Conduct:

Step 1. Online reporting please go to <https://www.whistleblowingservice.com.au/gcw/>

Step 2. click on the 'Make a Report' button below, you will be redirected to the new page where you need to enter:

- A Unique Key field, enter – [GRACE2022](#)
- A Client Reference Number, enter – dkwno2022

Step 3. Click on 'next' and follow the prompts.

The Process

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- Where a staff member has acted as a whistleblower, the person to whom the disclosure was made will secure any records or information related to the alleged issue.
- Information can be provided in any format. Claims made in conversation should be documented by the person receiving the claim. The record of conversation should be signed by the whistleblower to verify it is a true account.
- Any information shared about the allegations raised by a whistleblower will be de-identified to protect the whistleblower's identity and stored securely while the matter is examined.
- Should the organisation decide that an internal investigation is required, care must be taken to protect the integrity of any evidence, and the usual internal investigation process should be followed.
- GCW will appoint a manager to investigate as outline in the GCW - Code of Conduct Policy.
- Investigations will be confidential, fair and objective. The GCW - Code of Conduct always applies.
- All staff of the GCW group of companies will comply with all legal requests for information in a timely manner. Requests by external parties for information will be responded to using the organisation's complaints, access to information and privacy policies.
- The Manager overseeing the investigation or working on the issue raised by the whistleblower will keep the whistleblower and all other parties informed about the process and the outcome of the investigation where permitted.
- If the matter is investigated by an external organisation or referred to police or another investigating body, there may be limits on what information can be shared. In this case, involved parties will be advised of any limitations on the release of information.
- Staff who are impacted will be offered support through the employee assistance program.

Expected Behaviour and Code of Conduct

GCW group of companies values a workplace culture that promotes a working environment which is inclusive and embracing of diversity by implementing a zero tolerance for bullying / discriminating / harassing / victimising or vilifying behaviour. This is achieved through continuously educating our employees, officers and contractors on the standard the GCW group expects of its employees.

Breach of Policy

All individuals covered by this policy are always expected to adhere to the standards of behaviour contained herein. Any employee, officer or contractor, who is found to have breached this policy will be disciplined accordingly, which may lead to, and include termination of employment or engagement.

Group Management